

MALEEHA AHMAD, et al v. CITY OF ST. LOUIS
Deposition of WILLIAM PATRICK MOBLEY taken on 01/28/2019

IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF MISSOURI

MALEEHA AHMAD, et al,)	
)	
Plaintiffs,)	
)	
vs.)	No. 4:17-CV-2455 CDP
)	
CITY OF ST. LOUIS,)	
)	
Defendant.)	

Deposition of WILLIAM PATRICK MOBLEY
taken on behalf of the Defendant
January 28, 2019

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Questions By:

Page:

MS. DUNCAN

5

Reporter: Sara Alice Masuga, CSR, CCR
IL CSR No. 084-002993 MO CCR No. 1012

MASUGA REPORTING SERVICE
2033 HIAWATHA AVENUE
ST. LOUIS, MO 63143-1215

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Exhibit M

MALEEHA AHMAD, et al v. CITY OF ST. LOUIS
Deposition of WILLIAM PATRICK MOBLEY taken on 01/28/2019

1 IN THE UNITED STATES DISTRICT COURT
2 FOR THE EASTERN DISTRICT OF MISSOURI

3 MALEEHA AHMAD, et al,)
4 Plaintiffs,)
5 vs.) No. 4:17-CV-2455 CDP
6 CITY OF ST. LOUIS,)
7 Defendant.)

8
9 APPEARANCES:

10 On Behalf of the Plaintiff:

11
12 ACLU
13 By Anthony E. Rothert, Esq.
14 906 Olive Street
15 Suite 1130
16 St. Louis, MO 63101

17 On Behalf of the Defendant:

18 City Counselor's Office
19 By Abby Duncan, Esq.
20 Megan G. Bruyns, Esq.
21 1200 Market Street
22 City Hall Room 314
23 St. Louis, MO 63103
24
25

MALEEHA AHMAD, et al v. CITY OF ST. LOUIS
Deposition of WILLIAM PATRICK MOBLEY taken on 01/28/2019

1 IT IS STIPULATED AND AGREED by and between
2 counsel for Plaintiffs and counsel for Defendant that the
3 deposition of WILLIAM PATRICK MOBLEY may be taken
4 pursuant to the Federal Rules of Civil Procedure, by and
5 on behalf of the Defendant on January 28, 2019, at the
6 offices of the ACLU, 906 Olive Street, St. Louis,
7 Missouri, before me, Sara Alice Masuga, Certified Court
8 Reporter and Certified Shorthand Reporter; that the
9 issuance of notice is waived and that this deposition may
10 be taken with the same force and effect as if all Federal
11 Rules had been complied with.

12 IT IS FURTHER STIPULATED AND AGREED that the
13 signature of the deponent is reserved.

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Exhibit:

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Defendant's Exhibit B.....54
(Declaration of W. Patrick Mobley)

Defendant's Exhibit C.....55
(Cell Phone Screenshots of Text Message from
W. Patrick Mobley to Gilbert Mobley, Plaintiff 00774)

(Exhibits attached.)

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1 WILLIAM PATRICK MOBLEY produced, sworn, and
2 examined as a witness on behalf of the Defendant
3 testified as follows commencing at 2:04 p.m.:

4
5 E X A M I N A T I O N

6 BY MS. DUNCAN:

7
8 Q. Could you state and spell your name for the
9 record, sir?

10 A. William Patrick Mobley, M-o-b -- as in boy --
11 l-e-y.

12 Q. I just introduced myself to you, sir. My name
13 is Abby Duncan. I work for the City of St. Louis. I'm
14 one of the attorneys on this case. This is Meg Bruyns.
15 She's also one of the attorneys on this case.

16 Have you ever given your deposition before?

17 A. No.

18 Q. Have you represented people who've given
19 depositions before?

20 A. Yes.

21 Q. Okay. How many times would you have sat in on
22 a depo would you say?

23 A. Two or three times at the most.

24 Q. Okay, okay. 'Cause I understand you're an
25 attorney, right?

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1 A. Yes.

2 Q. Okay. Is deposition work not a big part of
3 what you do?

4 A. No.

5 Q. Okay. Okay. Well, just to kind of go over
6 some ground rules. Sara is our court reporter. She's
7 taking down everything that we say, so all of your
8 answers should be verbal. Any "nuh-uhs" or "huh-uhs,"
9 they don't translate onto the record. Also, if you'd be
10 sure not to talk over me, I'll try not to talk over you.
11 It makes for a cleaner record. And then finally, if I
12 ask you anything that's worded funny or that you don't
13 understand, if you'll just let me know and I'll rephrase.
14 Otherwise I'll assume that if you've answered a question
15 I've asked, that you under the question; is that fair?

16 A. Yes.

17 Q. I want to start off with just some background
18 information. Could you tell me your date of birth?

19 A. [REDACTED].

20 Q. Okay. And your address?

21 A. [REDACTED].

22 Q. And is that in the city?

23 A. Yes.

24 Q. Okay. I want to talk a little bit about your
25 educational background. Where did you go to high school?

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1 A. Davenport Central High School in Davenport,
2 Iowa.

3 Q. And where did you go for undergrad?

4 A. University of Michigan.

5 Q. And what about for graduate school?

6 A. I went to law school at the University of
7 Michigan.

8 Q. When did you graduate there?

9 A. December, 2010.

10 Q. Any other graduate studies other than law
11 school?

12 A. No. Well, I did get a little bit of graduate
13 credit when I did Teach For America. I don't remember
14 what school it was from, but I had to have a certain
15 amount of credit to teach for two years and I got that.

16 Q. Okay.

17 A. I didn't earn a degree, though.

18 Q. Okay. So, whatever certification you
19 needed --

20 A. Yeah.

21 Q. -- for Teach For America? Okay. Where are
22 you currently employed?

23 A. Legal Services of Eastern Missouri.

24 Q. And what do you do for them?

25 A. I am the Program Director of Legal Advocacy

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1 for Adults with Mental Illness.

2 Q. And how long have you been in that position?

3 A. Since July 1, 2013, so going on six years.

4 Q. Okay. And what did you do before that?

5 A. I was a Skadden Fellow and a staff attorney in
6 the Children's Legal Alliance.

7 Q. And how long did you do that for?

8 A. Almost two years.

9 Q. So, from 2011 to 2013 --

10 A. Yes.

11 Q. -- roughly? Before that, did you do anything
12 professionally?

13 A. Immediately before that, I was in law school.
14 Before I went to law school, I taught in St. Louis public
15 schools for two years.

16 Q. Okay. Where did you teach, what school?

17 A. Columbia Elementary.

18 Q. And was that with your Teach For America --

19 A. Yes.

20 Q. -- thing? I want to ask you maybe some of
21 your affiliations with certain organizations. Have you
22 ever worked with the ACLU before?

23 A. I was a legal intern at the ACLU in 2009, the
24 summer of 2009.

25 Q. And was that the ACLU here in the city --

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1 A. Yes.

2 Q. -- or --

3 A. Yeah.

4 Q. Okay.

5 A. And I'm currently on the ACLU Legal Committee.

6 Q. What is the Legal Committee --

7 A. It's --

8 Q. -- is that like the board or something?

9 A. It's a subcommittee of the board that approves
10 the cases that the legal staff will take on.

11 Q. Okay. How many people are on that board?

12 A. I don't know the answer to that.

13 Q. Okay. So, the -- the Committee votes on what
14 cases the ACLU will take on?

15 A. Yes.

16 Q. So, did you vote on this particular case?

17 A. No.

18 Q. Okay. Other than this case, has the ACLU ever
19 represented you in any other lawsuits?

20 A. No.

21 Q. How long have you been on this Legal
22 Committee?

23 A. Since 2013.

24 Q. How often do you-all meet?

25 A. Once a month.

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1 Q. Who are some of the other Committee members on
2 this Committee?

3 A. Denise Field from WashU, Brad Pierce, who's a
4 local attorney, Thomas Durphy is a local attorney. Those
5 are the folks whose first and last names I know, I think.

6 Q. Okay. There may be others --

7 A. Yeah.

8 Q. -- but those are the only ones you know? Have
9 you ever donated money to the ACLU?

10 A. Yes.

11 Q. When's the last time you donated money to
12 them?

13 A. I have an ongoing contribution, monthly
14 contribution.

15 Q. And how much is that for?

16 A. My partner set it up, so I don't know the
17 monthly amount.

18 Q. Okay. And your partner is?

19 A. Jacki Langum, L-a-n-g-u-m.

20 Q. Name sounds familiar. Does she work at Legal
21 Services?

22 A. She did.

23 Q. Okay.

24 MS. BRUYNS: I think she works for Arch City
25 Defenders.

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1 MS. DUNCAN: Oh, yeah.

2 (Questions by Ms. Duncan)

3 Q. Does she work for Arch City?

4 A. Yes.

5 Q. There we go. Thank you. That's where I
6 recently saw it. And that was going to be my next
7 question, whether you knew of the organization Arch City
8 Defenders.

9 A. I do.

10 Q. Okay. And what position does she hold in Arch
11 City Defenders?

12 A. She's the Director of Advocacy.

13 Q. Is she an attorney?

14 A. Yes.

15 Q. And what is your -- do you have any regular
16 interaction with Arch City Defenders apart from your
17 relationship with Miss Langum?

18 A. No.

19 Q. Do you know other members of leadership in
20 that organization?

21 A. Yes.

22 Q. Do you interact with them socially?

23 A. Yes.

24 Q. Have you ever hired Arch City Defenders to
25 represent you?

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1 A. No.

2 Q. Ever donated money to Arch City Defenders?

3 A. Yes.

4 Q. Okay. And is that also on a monthly basis?

5 A. No.

6 Q. Okay. How much money would you say you've
7 donated to that organization?

8 A. Probably 200 or 250 dollars over the past few
9 years.

10 Q. Do you know who Megan Green is?

11 A. Yes.

12 Q. And how do you know her?

13 A. She's an alderwoman.

14 Q. Is she your alderwoman?

15 A. No.

16 Q. What have been your interactions with her?

17 A. I don't think that I've ever personally
18 interacted with her. I know who she is because she's in
19 government and I've -- like I watched the debate that she
20 participated in this weekend.

21 Q. Okay. What was the debate? What debate was
22 that?

23 A. President of the Board of Aldermen.

24 Q. Oh, okay. Yeah, that's right. She's running
25 for that.

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1 Have you had any contact with her about this
2 case?

3 A. No.

4 Q. Okay. I want to talk some about your protest
5 history. As we sit here today, what's the most recent
6 protest you've attended?

7 A. The most recent protest that I attended was
8 the one in question.

9 Q. Okay. On September 17 --

10 A. Yes.

11 Q. -- 2017?

12 A. Correct.

13 Q. Okay. Before that, what other protests had
14 you partaken in?

15 A. I was there the day -- during the daytime
16 immediately after the verdict. I don't know what day
17 that was on.

18 Q. Okay. September 15?

19 A. Yes.

20 Q. Okay.

21 A. And I participated in other protests in the
22 city and county. I'm not sure I could list all of them.

23 Q. Okay. How many of them would you say?

24 A. Probably between eight and 12.

25 Q. Okay. And what were -- what were some of the

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1 causes that were that you were protesting those eight to
2 12 times?

3 A. Usually some kind of -- Well, there -- many of
4 them were related to the Ferguson uprising. Many around
5 the Mike Brown shooting. And I -- I -- I don't remember
6 exactly every single one. I would say that most of them
7 related to Ferguson or other civil rights issues.

8 Q. Okay. Are most of them involving
9 officer-involved shootings?

10 A. Yes.

11 Q. Okay. What about protests, like Justice for
12 Isaiah, have you ever participated in a protest?

13 A. No.

14 Q. Okay. What about Ball-Bey?

15 A. No.

16 Q. Okay. Before September 15, 2017, do you
17 remember the last protest that you attended --

18 A. It would have been --

19 Q. -- prior to that?

20 A. It would have been the one on September 15.

21 Q. Okay. But before then?

22 A. No, I don't remember what the last one was.

23 Q. And these eight to 12 protests, these take
24 place over what time span?

25 A. From 2014 to the present.

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1 Q. Okay. And at these protests, excluding the
2 ones that we're going to talk about, the September 17 and
3 September 15, at these other eight to 12 protests that
4 you've attended, what -- what protest activity did you
5 participate in, what were some of the things that you did
6 when you were protesting?

7 A. Mostly marching and chanting.

8 Q. Okay. And what did you chant?

9 A. All kinds of things. "Whose streets? Our
10 streets." The -- I can't remember how it begins, but it
11 ends with, "All we have to lose is our chains." And then
12 usually just whatever the crowd was chanting. I don't
13 remember any other specific ones.

14 Q. Okay. Do you remember chanting, "Fuck the
15 police"?

16 A. No.

17 Q. At these other eight to 12 -- Well, where --
18 where were these eight to 12 protests located?

19 A. Mostly in the City of St. Louis. Some of them
20 in Ferguson and some elsewhere in the county.

21 Q. For the ones that took place in the city,
22 where did those protests take place; do you remember
23 specifically?

24 A. Mostly downtown.

25 Q. Okay.

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1 A. And I -- I was in the Central West End one
2 time that I can remember.

3 Q. Okay. And this was all during the
4 Michael Brown Ferguson protest --

5 A. Yes.

6 Q. -- time? Did you see any teargas, mace, or
7 pepper spray deployed at those protests?

8 A. No.

9 Q. Was there a police presence at those protests?

10 A. Yes.

11 Q. Any other prior protests that you've been
12 involved in, whether Black Lives Matter, Women's Marches,
13 LGBTQ, the MSI Workhouse protest?

14 A. I did go to a rally for the Close the
15 Workhouse campaign. Actually, I guess I didn't think of
16 that as a protest, but that's happened subsequent to --
17 to this, to --

18 Q. Okay.

19 A. -- since September 15 or 17 --

20 Q. Okay.

21 A. -- 2017. There was one rally. I don't
22 remember which downtown building it was in front of, but
23 I attended that.

24 Q. Okay. And this was after the events of the
25 weekend of September 15 --

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1 A. Yes.

2 Q. -- 2017?

3 A. Yes.

4 Q. Okay. You said this was downtown. Do you
5 remember when this was exactly?

6 A. It was the day of the Veiled Prophet parade.

7 Q. Veiled Prophet?

8 A. Yes.

9 Q. I have no idea when that would be.

10 MS. DUNCAN: Do you have any i- -- Do you
11 know?

12 MS. BRUYNS: Is it summer? It's summer.

13 A. Yeah, it was in the summer.

14 (Questions by Ms. Duncan)

15 Q. Okay. So, this would have been summer of '18
16 then?

17 A. Yes.

18 Q. Okay. I feel bad that I don't know what that
19 is.

20 MR. ROTHERT: Don't.

21 MS. DUNCAN: Okay.

22 (Questions by Ms. Duncan)

23 Q. What -- What activity -- what protesting
24 activity did you participate in at the MSI rally?

25 A. It was standing on the sidewalk and listening

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1 to speakers.

2 Q. Okay. Was there a police presence at those
3 protests or at that protest?

4 A. Yes, although it seemed mostly to be for the
5 parade.

6 Q. Okay. This Veiled Prophet parade?

7 A. Yes.

8 Q. Okay. Any mace, teargas, pepper spray
9 deployed at that rally?

10 A. No.

11 Q. What speakers were there at the MSI rally?

12 A. I'm fairly sure that Kayla Reed would have
13 spoken.

14 Q. Okay.

15 A. There was one speaker who was someone who had
16 been detained in the Workhouse. I don't remember her
17 name. Those are the two speakers that I remember. There
18 very likely were others that I don't remember.

19 Q. Sure. Okay. Any other protest? I'm just
20 going to throw a few out there just to kind of jog your
21 memory. The Fight For 15? It's a minimum wage one.

22 A. No.

23 Q. VonDerrit Myers?

24 A. No.

25 Q. Okay. I want to get into the weekend of

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1 September 15, 2017, which is why you're here. You
2 mentioned two dates. You mentioned September the 15th
3 and then September the 17th; is that right?

4 A. Yes.

5 Q. Okay. What happened on September the 15th?
6 Well, let me ask you this first: How did you hear about
7 the Stockley verdict?

8 A. I was watching for it and I'm sure I saw it.
9 I was in Kansas City at the time because I was there for
10 a Missouri Bar meeting --

11 Q. Okay.

12 A. -- and I remember the verdict coming down and
13 I got a notification on my phone. I don't remember what
14 news source.

15 Q. Okay. Do you remember what time of the day it
16 was?

17 A. In the morning.

18 Q. And what was your reaction to the verdict?

19 A. I thought it was an injustice.

20 Q. And what, if anything, did you do in response
21 to the verdict?

22 A. That day I rode home with a friend of mine
23 from Kansas City to St. Louis and I did go onto Tucker
24 that day after I got back from Kansas City.

25 Q. Okay. And what time did you return from

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1 Kansas City?

2 A. It was in the afternoon. Early afternoon I
3 would guess.

4 Q. And when you say that you went to Tucker, do
5 you mean like Tucker and Clark, down by the courthouses,
6 or --

7 A. Yeah, I didn't --

8 Q. -- Tucker and Market?

9 A. -- get as -- I didn't get as far as Tucker and
10 Clark.

11 Q. Okay.

12 A. I was coming out of Christ Church Cathedral
13 and walked down to Tucker and I don't remember how far
14 down I got, but I know I wasn't down as far as Clark.

15 Q. Okay. Christ Church Cathedral, is that where
16 the Arch City Defenders are located?

17 A. That's where it used to be.

18 Q. Okay. Was it at --

19 A. It was then --

20 Q. -- that time?

21 A. -- yes.

22 Q. Okay. Okay. And you said you went --

23 MR. ROTHERT: Don't -- Excuse me.

24 MS. DUNCAN: I'm sorry?

25 MR. ROTHERT: Don't talk over her. Let her

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1 get the question out.

2 THE WITNESS: Okay.

3 MR. ROTHERT: Thank you.

4 (Questions by Ms. Duncan)

5 Q. So, you walked from Cwist Chur- -- Christ
6 Church Cathedral to Tucker, towards Tucker -- along
7 Tucker for the protest; is that right?

8 A. Correct.

9 Q. Okay. Did you walk there with anyone else?

10 A. I assume that Jacki Langum was with me --

11 Q. Okay.

12 A. -- but I don't remember in particular her
13 being with me.

14 Q. Okay. Anyone else?

15 A. Not that I walked there with.

16 Q. Okay. At what point do you join -- Well, let
17 me ask you this: Were there other protestors there as
18 you were walking along Tucker?

19 A. Yes.

20 Q. How many would you say?

21 A. In the hundreds --

22 Q. Okay.

23 A. -- but I couldn't say any more precisely than
24 that.

25 Q. Okay. Where -- Did you end up staying at any

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1 particular location or were you wandering along Tucker
2 or --

3 A. I -- I'm Sorry. I think I walked up and down
4 Tucker.

5 Q. Okay. Between the intersections of which
6 streets?

7 A. I would say Pine and I think I got not quite
8 to Market.

9 Q. Okay. And there were hundreds of people in
10 that area?

11 A. I think so.

12 Q. Okay. Was there a police presence?

13 A. Yes.

14 Q. Okay. What were you doing as -- as you were
15 there?

16 A. Walking up and down the street and observing.

17 Q. Okay. Were you chanting anything?

18 A. No.

19 Q. And what did you observe?

20 A. Mostly I -- As I recall, Tucker was shut down
21 and, so, it was mostly people milling about. I don't
22 remember whether there were any chants or anything like
23 that.

24 Q. Okay. At what -- Did you say at what time
25 that you arrived there?

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1 A. Late afternoon --

2 Q. Okay.

3 A. -- by my best estimation.

4 Q. And did you do anything else besides walk up
5 and down Tucker between Pine and Market observing people?

6 A. I talked to folks.

7 Q. Do you know who you talked to?

8 A. The only person that I remember talking to is
9 Brendan Roediger.

10 Q. And Brandon Roedi- -- Brandon (sic) Roediger
11 is a professor at SLU Law?

12 A. Yes.

13 Q. Okay. And do you have any other affiliations
14 with SLU Law?

15 A. I'm a part-time adjunct there, although I'm
16 not teaching this semester. I taught last semester.

17 Q. What do you teach?

18 A. A section of civil practice.

19 Q. Okay. I guess, what do you teach specifically
20 in regards to civil practice?

21 A. We go through a set of skills beginning with
22 client/witness interviews up through arguing motions all
23 stuff in between. Depo prep. They do briefs --

24 Q. Uh-huh.

25 A. -- and basically taking a case over the course

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1 of a semester from the client interview through to
2 arguing a motion.

3 Q. Okay. And who is your supervisor?

4 A. Brendan Roediger.

5 Q. Okay. How long have you been teaching at SLU
6 Law under Brandon (sic) Roediger?

7 A. Just one semester.

8 Q. That's the only time you did it was just that
9 one time?

10 A. Yes. And I should say it's Brendan --

11 Q. Sorry.

12 A. -- with an "e" -- that's okay -- for your
13 benefit.

14 Q. Yeah. We just hired a guy who's named
15 Brandon. They sound the same.

16 What police activity -- You said that people
17 were milling about, the other protestors were?

18 A. Yes.

19 Q. And they were chanting?

20 A. I don't remember.

21 Q. Okay. Anything else you remember about the
22 protestors --

23 A. No.

24 Q. -- and their activity?

25 A. (Shaking head.)

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1 Q. No?

2 A. No.

3 Q. Okay. What, if anything, do you remember
4 about police actions?

5 A. I think I said that I -- as I recall, Tucker
6 was closed and, so, I presume it was the police who had
7 done that.

8 Q. Do you know why they had done that?

9 A. No.

10 Q. Okay.

11 A. And I don't -- I mean, I know I saw police
12 officers, but I don't think I even saw any interactions
13 between protestors and police officers.

14 Q. So, at the point that you were out at Tucker
15 in late afternoon of September 15, 2017, you didn't see
16 any mace, pepper spray, or -- or teargas being deployed
17 by police officers; is that right?

18 A. That's right.

19 Q. Okay. Anything else that you remember
20 observing or seeing on September 15?

21 A. No.

22 Q. Okay. How long did you stay in that area for
23 to protest?

24 A. My best estimate would be about 60 minutes.

25 Q. Okay. So, you're there from late afternoon to

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1 what, early evening; is that fair?

2 A. Probably more accurate late afternoon to later
3 in the afternoon.

4 Q. Okay.

5 A. I -- It was --

6 Q. So, like 4:00 or 5:00?

7 A. Yeah, it was sunny when I got there and sunny
8 when I left.

9 Q. Okay. And after you left, where did you go?

10 A. Home.

11 Q. And did you participate in any other
12 protesting activities on September 15, 2017?

13 A. No.

14 Q. Okay. Any activity you participated in on
15 September 16, 2017? That would have been that Saturday.

16 A. I think that that is when I was in the Central
17 West End.

18 Q. Okay.

19 A. And at that, I was handing out water.

20 Q. Where -- What specific location in the Central
21 West End would you have been at?

22 A. We -- The group was walking up Skinker and I
23 don't remember if it turned on Delmar or which direction.
24 I had parked a ways away and walked with a bucket of
25 water or bin full of bottles of water and, so, I was

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1 mostly behind any protest that was happening.

2 Q. Okay. And what time did you arrive at the
3 Skinker location? Is this on Skinker and -- and Delmar?

4 A. It's south of Delmar --

5 Q. Okay.

6 A. -- that I first saw the group. I would say
7 maybe roughly Forest -- north of Forest Park.

8 Q. Okay.

9 A. And I would have arrived there that was
10 sometime in the evening.

11 Q. Okay. Would you say six o'clock?

12 A. Six o'clock or later.

13 Q. Okay. And you mentioned the group that was
14 there. Were you with a group?

15 A. Yes.

16 Q. Okay, what group were you with?

17 A. I don't -- It wasn't anything official. It
18 was a group that had organized to support the protestors.
19 So, like I said, I had a big bin full of bottled water.

20 Q. Okay. How many protestors were at that
21 Skinker location in the evening of the 16th?

22 A. I think, again, maybe roughly 200.

23 Q. Okay.

24 A. That's a very rough estimate.

25 Q. Sure. And you said you and a couple of other

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1 people had organized to aid the protestors or would you
2 say that? Assist them? Help them? How would you --

3 A. Yes.

4 Q. -- describe it?

5 A. Yeah, we were handing out water. I think
6 maybe some folks had snacks.

7 Q. Okay. And what other people were you with?

8 A. The only person whose name I remember is
9 Kennard Williams and I was not with him at the protest.
10 I was with him at the meet-up spot before we went down to
11 the protest.

12 Q. And where did you-all meet up before the
13 protest?

14 A. It was in north city and I don't remember.
15 I -- I think -- I think it was a church --

16 Q. Okay.

17 A. -- but I do not remember exactly where it was.

18 Q. How many people assembled there?

19 A. Ten.

20 Q. Okay. Was it organized by a particular group
21 or organization that put that on?

22 A. Not that I know of.

23 Q. Okay. Kennard Williams, who -- how -- how do
24 you know him?

25 A. He's a friend.

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1 Q. Okay. How do you know him?

2 A. I think that I would have met him either
3 through -- probably met him through Arch City Defenders.

4 Q. Okay. Does he work there?

5 A. No.

6 Q. Do you know where he works?

7 A. To my knowledge, he doesn't have a job right
8 now. At that time, he worked at MORE.

9 Q. Anyone else you remember handing out water
10 with on September 16?

11 A. I don't know anyone's name.

12 Q. Okay. And how long did you stay at that
13 location in the Central West End?

14 A. We were moving around a lot --

15 Q. Okay.

16 A. -- so I don't remember how long we stood
17 there, but then we were just handing out water to anybody
18 who needed it.

19 Q. Okay. And did people approach you or you
20 approach them or both?

21 A. I would say both.

22 Q. Okay. Who purchased the water to hand out?

23 A. I don't know.

24 Q. Okay. I may have already asked you this.
25 Sorry, it's been a long day. Did you say how long that

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1 you stayed there?

2 A. We didn't stay at the intersection where the
3 group was for very long. I think the group started
4 moving north and I was probably out that night for three
5 or four hours.

6 Q. Okay. Along with handing out bottled water,
7 were you chanting?

8 A. No.

9 Q. Were you holding any signs?

10 A. No.

11 Q. Okay. And then after being there for three or
12 four hours, where did you go?

13 A. Home.

14 Q. Did you participate in any other protesting
15 activity on September 16, 2017?

16 A. No.

17 Q. When you were at the Central West End location
18 on Skinker, what were some of the things that you
19 observed protestors doing?

20 A. I remember people holding signs. I'm
21 confident they were chanting, although I don't remember
22 what, and I recall seeing a group of protestors move
23 north on Skinker.

24 Q. Okay. Did you observe any protestors throwing
25 water bottles at the police?

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1 A. No.

2 Q. Did you observe any protestors throwing rocks
3 at police?

4 A. No.

5 Q. Did you observe any protestors throwing
6 concrete blocks at police?

7 A. No.

8 Q. Did you observe any protestors verbally
9 threatening police?

10 A. No.

11 Q. What police activity did you observe on
12 September 16, if any?

13 A. Their presence.

14 Q. Okay. Any macing, pepper spray, teargas
15 deployed that you saw?

16 A. No.

17 Q. Let's move to September the 17th. What
18 protesting activities did you participate in on
19 September 17?

20 A. I drove there with Kennard Williams and we
21 joined a group that was in front of Police Headquarters
22 on Olive and --

23 Q. At about what time was that?

24 A. This would have been late afternoon.

25 Q. Okay.

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1 A. Maybe early evening. It was -- I think I
2 remember the sun kind of starting to go down.

3 Q. Okay.

4 A. The purpose of my being there was to support
5 the protestors. I had a bottle of Milk of Magnesia and
6 water.

7 Q. Okay.

8 A. And when the protest moved toward downtown,
9 Kennard and I didn't go with them. We followed it quite
10 a distance.

11 Q. Okay. As I understand it, the protests that
12 happened at Police Headquarters kind of went away from
13 Police Headquarters to SLU and then back around to
14 Headquarters; is that fair?

15 A. I don't know about back to Headquarters. I
16 know that it left Police Headquarters heading downtown.
17 And that -- I don't remember ever seeing a group after
18 that.

19 Q. Okay. At Police Headquarters, how many
20 protestors would you say you saw there?

21 A. Probably, rough estimate, 200 again.

22 Q. Okay. Did you see any police, in the late
23 afternoon of 17, did you see any police deploy teargas,
24 pepper spray, or mace at that time?

25 A. No.

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1 Q. Okay. You said that there was a group of
2 people that proceeded to head downtown?

3 A. Yes.

4 Q. Okay. And that you did not go downtown with
5 them?

6 A. Not with them, no. At a considerable
7 distance, we wal- -- we walked in that direction.

8 Q. Okay. Would this have been about still the
9 late afternoon or are we getting into evening at that
10 point?

11 A. Probably into early evening by then.

12 Q. Okay. Early evening 5:00 to 6:00-ish?

13 A. That sounds right. Maybe 6:00 to 7:00.

14 Q. And what activity did you observe when you
15 followed the group downtown?

16 A. It was out of my sight.

17 Q. Okay. Did you hear any windows being broken?

18 A. No.

19 Q. Did you hear any planters being destroyed?

20 A. No.

21 Q. Did you use any of the equipment that you had
22 brought to assist protestors on the 17th, the Milk of
23 Magnesium (sic) and water?

24 A. No.

25 Q. After you moved towards downtown, what -- what

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1 happened; how long were you in that downtown area?

2 A. So, by the time that I made it downtown, I
3 don't remember there being any group of protestors. I
4 walked around for 30 minutes to an hour --

5 Q. Okay.

6 A. -- and then I was on my way back to the car
7 when I was detained.

8 Q. Okay. And when you were walking around for 30
9 minutes to an hour, what -- what were you doing?

10 A. I was just looking around.

11 Q. Did you observe anything in particular by way
12 of protests or police?

13 A. I saw a lot of police. Some of them on bikes
14 kind of staging. There was one street that was blocked
15 off, I don't remember which, but I turned when I got to
16 there. And there were non-police on the streets, but
17 there wasn't any group, there wasn't any protest that I
18 remember seeing.

19 Q. Okay. Where was your car located?

20 A. It was I think a block north of Market, north
21 of Union Station.

22 Q. So, you made your way then from downtown to
23 your car?

24 A. Yes.

25 Q. And would this be about at 7:00 p.m. or what

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1 time frame would you give this?

2 A. I think it wa- -- it would have been more like
3 8:00.

4 Q. Okay.

5 A. 8:00 or 9:00.

6 Q. And were you walking with Kennard?

7 A. No.

8 Q. Okay. At what point did he -- did you go your
9 separate ways with Kennard?

10 A. He went ahead of me to get closer to the group
11 when we were going downtown.

12 Q. Okay. So, would you say he was a part of that
13 group that went downtown?

14 A. I couldn't say.

15 Q. Okay. At that point, though, you had kind of
16 split off?

17 A. Yes.

18 Q. Okay. So, do you reach your car at about 8:00
19 p.m.?

20 A. No.

21 Q. Tell me what happened as you made your way
22 back to your car.

23 A. I had crossed Tucker and was heading west on
24 Pine. And I think in front of the second building on
25 that block, I saw two young people being arrested and

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1 began to film it.

2 Q. Okay. How old were these young people?

3 A. I would say 18 or 19 years old.

4 Q. Okay. And you said that you began to film it?

5 A. Correct.

6 Q. Why did you do that?

7 A. Because I was interested to see what would
8 happen.

9 Q. Okay. Did you observe police officers at that
10 location?

11 A. Yes.

12 Q. How many?

13 A. Six to eight.

14 Q. Okay. And were they all interacting with
15 these two young people?

16 A. No.

17 Q. Okay. How many officers were interacting with
18 the two young people?

19 A. When I saw them, I think that they were
20 sitting -- I know they were sitting on the curb and I
21 don't remember whether there were any officers actually
22 interacting with them.

23 Q. Okay. So, when you took your camera -- I
24 assume it was your cell phone?

25 A. Yes.

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1 Q. Okay. When you took out your cell phone to
2 film them, you were filming them sitting on the curb?

3 A. Yes.

4 Q. Okay. And what happened after that?

5 A. So, I was on the north side of Pine. They
6 were on the south side of Pine. And shortly after I had
7 got my camera out and began to film, a police officer in
8 a white shirt and a helmet came and took my phone from
9 me.

10 Q. Do you know what the officer's name was?

11 A. No.

12 Q. Did he say anything to you or did he just take
13 your phone?

14 A. He just took my phone.

15 Q. Okay. How did you respond to that?

16 A. I don't quite remember. I don't -- I was
17 stunned and I don't think that I said anything until that
18 the white shirt officer had handed my phone to a
19 plainclothes officer who was using my phone and I said
20 please don't access my phone. I think that was the first
21 thing that I said --

22 Q. Uh-huh.

23 A. -- in -- in all of this. And I don't remember
24 whether I had given that officer my driver's license yet
25 or not. I gave it to the white shirt at some point he

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1 asked for it. He told me that someone named Mosley was
2 wanted for a crime and, so, he had to run my name through
3 the database and it's Mobley.

4 Q. Right. Had they -- they asked you your name
5 beforehand?

6 A. I don't remember.

7 Q. So, the white shirt officer comes to you and
8 asks for your phone, you give it to him, and then at that
9 point, the red shirt officer tries to access your phone;
10 is that your testimony?

11 A. He didn't ask for my phone. He just took it.

12 Q. He took it, okay.

13 A. And, yes, then the white shirt handed it to
14 the plainclothes officer, who was wearing a red polo
15 shirt and a bulletproof vest and that was the officer who
16 accessed my phone.

17 Q. Okay. And then you told the plainclothesed
18 officer not to access your phone, and what did he say
19 back?

20 A. He said, "Why would I use your phone? I have
21 my own fucking phone."

22 Q. Okay. And then what happened?

23 A. Then I was ordered to sit on the curb with my
24 legs in front of me, which I did. I complied with all
25 their orders. As I was sitting there, I had a number of

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1 interactions with officers. One of them came and yelled
2 at me that he was going to arrest me for property
3 destruction and resisting arrest and then another officer
4 whispered something to him and he walked away without
5 saying anything else to me.

6 Q. Did you know whether or not property damage
7 was occurring in the downtown area?

8 A. I had seen broken windows and planters when I
9 was walking around.

10 Q. So, is that a "yes" then --

11 A. Yes.

12 Q. -- you knew that that was happening?

13 A. Yes.

14 Q. Okay. How many broken planters did you see?

15 A. Maybe four.

16 Q. Do you remember at what locations you saw
17 that?

18 A. I'm almost certain that the broken window --
19 maybe broken windows and planters that I saw were on
20 Wash. Ave.

21 Q. Okay. How many broken windows did you see?
22 You said about four planters, right?

23 A. Yeah, I think. I remember in particular one
24 window being broken, but I don't think that that was the
25 only one I saw.

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1 Q. Okay. And this was all along Wash. Ave.?

2 A. As I recall. I'm not a hundred percent
3 certain.

4 Q. Sure. So, then after one of the officers said
5 something about property damage, what happened?

6 A. At some point, the -- and I don't remember
7 whether this was before or after I got yelled at that I
8 was going to be arrested, the plainclothes officer
9 crouched down beside me. He asked me whether I had been
10 downtown breaking windows and I said, "No." And he said,
11 "Well, we'll just take you to jail and find somebody
12 who'll say that you did." He searched my bag without my
13 consent. Asked whether I had a hammer, and I did not.

14 Q. Did you tell him you did not?

15 A. Yes. And then I -- I don't remember whether I
16 had any other interactions with police officers before I
17 got my driver's license back. When I did get it back,
18 the squad officer I think who had run my -- my ID through
19 the system came and gave it to the plainclothes officer
20 who still had my phone, and he knelt down next to me and
21 he said, "You're going to take this and put it in your
22 wallet, you're going to get your phone, and you're going
23 to walk away. And if you so much as turn around, I'll
24 arrest you because I'm not in the mood."

25 Q. Okay. And did you comply with those orders?

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1 A. Yes.

2 Q. And at that point, did you make your way to
3 the car?

4 A. Yes.

5 Q. And then what happened?

6 A. Then I went home. Kennard -- It was Kennard's
7 car and he took me home. I don't remember if I had to
8 wait there or not.

9 Q. Okay. During your interactions with police at
10 that location -- It would have been Tucker and Pine --

11 A. Yes.

12 Q. -- where this happened, right?

13 A. Yes.

14 Q. At that location, was any mace, pepper spray,
15 or teargas deployed against you?

16 A. No.

17 Q. Were any of those agents deployed against the
18 two young people who were there?

19 A. Not that I saw.

20 Q. Okay. What was happening with the young
21 people as you were interacting with -- with police, were
22 they still sitting on the curb?

23 A. As far as I can recall. I kind of lost track
24 of them once I was having to deal with the police on my
25 own. So, I don't remember seeing them drive away, so I

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1 assume that they were still on the curb.

2 Q. Okay. Do you know what -- Do you have any
3 context of why they were sitting on the curb, what caused
4 them to be sitting on the curb?

5 A. No.

6 Q. Okay. When you saw them on the curb, were
7 they handcuffed?

8 A. Yes.

9 Q. Okay. Were you ever handcuffed?

10 A. No.

11 Q. Okay. Anything else about the events on
12 September 17 that you remember that we haven't discussed?

13 A. When I got my phone back, the video that I had
14 been taking had been deleted.

15 Q. Okay. And this is the video you took of the
16 two young people on the curb?

17 A. Yes.

18 Q. Do you remember how long that video lasted?

19 A. It was under a minute, I think, before the
20 officer took my phone.

21 Q. Anything else we haven't discussed about
22 September 17?

23 A. No, not that I can recall.

24 Q. Did you participate in any protesting
25 activities on September 29, 2017, near Busch Stadium?

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1 A. No.

2 Q. Okay. Did you participate in any other
3 protest activity regarding the Stockley verdict other
4 than what we discussed?

5 A. No.

6 Q. Did you experience any exposure to mace,
7 pepper spray, or teargas the weekend of September 15?

8 A. No.

9 Q. And I believe that your testimony was that you
10 didn't see any protestors get maced, pepper-sprayed, or
11 teargassed that weekend, either; correct?

12 A. That's correct.

13 Q. At either of the events that you attended on
14 the weekend of September 15, did you hear any protestors
15 making violent threats towards police officers?

16 A. No.

17 Q. And at any point during that weekend, did you
18 see water bottles being thrown at police?

19 A. No.

20 Q. Did you see rocks being thrown at police?

21 A. No.

22 Q. What about broken concrete towards police?

23 A. No.

24 Q. Did you witness any property damage by
25 protestors or demonstrators?

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1 A. No.

2 Q. Okay. You mentioned the planters and the
3 broken windows. Do you know how they became broken?

4 A. No.

5 Q. When you were participating in protesting
6 activities on September 15, 16, I guess, as well, and the
7 17th, did you recognize any other protestors?

8 A. I probably did. I don't remember anyone
9 specific.

10 Q. Okay. Do you -- Would you have recognized any
11 of the legal observers that were out there?

12 A. Did I -- Sorry, can you repeat the question?

13 Q. Sure. Did you recognize any legal observers
14 that were out protesting or with -- amongst the
15 protestors that weekend?

16 A. No, I don't recall seeing anyone in a green
17 hat that I recognized.

18 Q. Okay. At any point during your protesting
19 activities that weekend, did you hear any dispersal
20 orders?

21 A. As I was walking west, this was, I think,
22 before I crossed Tucker --

23 Q. Is this on the 16th? 17th?

24 A. This was on the 17th.

25 Q. Okay.

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1 A. Sorry.

2 Q. That's fine.

3 A. I was walking west and there were large
4 vehicles going up and down Tucker giving dispersal
5 orders.

6 Q. And how were they giving dispersal orders,
7 were they shouting? Did they have, what are those,
8 foghorns?

9 A. There was a megaphone.

10 Q. Okay, there you go.

11 A. Sure.

12 Q. Okay.

13 A. Yeah, it was coming out of the trucks and it
14 was amplified somehow.

15 Q. Okay. And did you see protestors, in fact,
16 disperse in compliance with that order?

17 A. There were very few people on the street when
18 I saw that, so I didn't see anyone comply or not comply.

19 Q. Okay. How many times would you say you heard
20 a dispersal order on September 17?

21 A. Two or three.

22 Q. And this was around what time?

23 A. My best guess is 9:00 p.m.

24 Q. What specifically did you hear?

25 A. Best I can recall, it was, "You're engaged in

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1 an unlawful assembly. You're ordered to disperse. If
2 you don't disperse, you may be subject to the deployment
3 of chemical agents."

4 Q. Okay.

5 A. "Or arrest." I think they probably said, "Or
6 arrest."

7 Q. Okay. And did you hear that same phrase or
8 sayings two or three times?

9 A. Yes.

10 Q. Okay. When you saw the protestors heading
11 towards downtown, did you see protestors in the street?

12 A. Yes.

13 Q. Were they blocking traffic or interfering with
14 traffic, I guess?

15 A. I don't think so. My recollection is that
16 Olive was blocked off and I only saw folks on Olive.

17 Q. You don't remember seeing any vehicular
18 traffic?

19 A. No, there was no traffic.

20 Q. Okay. I think that you said that -- Well, let
21 me ask you. How did you find out about the protests on
22 September 15 that they were happening?

23 A. Well, I assumed that after a not guilty
24 verdict there would be something and I probably talked to
25 Jacki 'cause her office was downtown. I don't remember

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1 in particular how I found out.

2 Q. Okay. What about on September the 16th at the
3 Central West End, how did you find out about that?

4 A. I think it must have been from Kennard because
5 he was involved in organizing the place where we all met.

6 Q. Okay. And what about on the 17th?

7 A. Kennard, as well. I rode there with him.

8 Q. Okay. Do you know how he found out about
9 them?

10 A. No.

11 Q. When you were participating in protesting
12 activities, were you in the street?

13 A. Yes, on Olive.

14 Q. And on what day would that have been?

15 A. On the 17th. And I may have been on Tucker
16 and not on the sidewalk on the 15th, but there was no
17 traffic. And on the 16th, I think that the group had
18 assembled on Skinker and I don't know -- I mean, there
19 was no traffic again and I probably was on Skinker at
20 some point.

21 Q. When you say "there was no traffic," does that
22 just mean that there weren't a lot of cars?

23 A. There were zero cars moving on Skinker.

24 Q. Okay. When you say that there were dispersal
25 orders, did they -- what specific words were used when

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1 they said that? The police said that this was an
2 unlawful assembly and then they -- did they say -- did
3 they use the word "disperse" or did they say, "Leave the
4 area"?

5 A. I don't remember.

6 Q. I'm going to throw out some names and I just
7 want to see if you recognize the name.

8 A. (Nodding.)

9 Q. Fareed Alston?

10 A. No.

11 Q. Rasheen Aldridge?

12 A. Yes.

13 Q. How do you know Rasheen Aldridge?

14 A. He's a Democratic committeeman. I've seen him
15 speak at political events.

16 Q. Okay. Any other interactions you've had with
17 him other than that?

18 A. No.

19 Q. How about Brian Baude?

20 A. No.

21 Q. Amir Brandy?

22 A. No.

23 Q. Crystal Brown?

24 A. No.

25 Q. Emily Davis?

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1 A. No.

2 Q. Heather De Mian?

3 A. No.

4 Q. Alison Dreith?

5 A. I recognize the name. She is, as I recall,
6 the Director -- she works for Planned Parenthood and I
7 know her name from that. I don't recall ever speaking to
8 her.

9 Q. Ever or just at these --

10 A. Ever.

11 Q. -- events? Okay. What about Darryl Gray?

12 A. Do not recognize it.

13 Q. We've talked about Megan Green. Mark Gullett?

14 A. Don't recognize.

15 Q. Calvin Kennedy?

16 A. Don't recognize.

17 Q. Lindsay Laird?

18 A. I do not recognize.

19 Q. Andre Roberts?

20 A. Do not recognize that name.

21 Q. Derek Laney?

22 A. No.

23 Q. Iris Nelson?

24 A. No.

25 Q. Alex Nelson?

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1 A. No.

2 Q. Dillan Newbold?

3 A. It occurs to me I've heard that name before,
4 but I have no idea where or how.

5 Q. Okay. Mario Ortega?

6 A. No.

7 Q. Christopher Robertson?

8 A. No.

9 Q. Keith Rose?

10 A. I know Keith.

11 Q. How do you know Keith Rose?

12 A. I've met him at protests as well as various
13 events.

14 Q. Okay. And what other protests do you remember
15 seeing him at?

16 A. The one I can remember in particular was in
17 the county. It would have been in August, 2015. Other
18 than that, I assume if I was at a protest, I saw Keith,
19 but I don't remember specifically which ones.

20 Q. Okay. And the one on August of '15, was that
21 involving Michael Brown --

22 A. Yes.

23 Q. -- protest? And you said you've seen him at
24 other events. What other events would those have been?

25 A. I know I saw him at an Arch City event and,

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1 so, it's fundraising or political events.

2 Q. Do you interact with him socially?

3 A. No.

4 Q. Do you remember seeing him the weekend of
5 September 15?

6 A. I don't recall seeing him.

7 Q. Okay. What about Demetrius Thomas?

8 A. I don't recognize that name.

9 Q. Jonathan Ziegler?

10 A. I've heard the name somewhere. If it's the
11 person I'm thinking of, then he testified at the same
12 preliminary injunction hearing that I did.

13 Q. Right. Do you know of his -- his streaming
14 site, WebZ -- RebZ?

15 A. I know that that's -- I know it exists.

16 Q. Okay. Have you ever viewed anything on there
17 before?

18 A. Only what I saw in court on that day.

19 Q. Sure, okay. Have you seen any of these people
20 since the protests?

21 A. Can I amend my answer to --

22 Q. Yeah.

23 A. I may have watched one -- one stream on RebZ's
24 site.

25 Q. Okay.

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1 A. I don't remember where it was from, but I
2 recall, I think, doing that one time.

3 Q. Okay. Was that --

4 A. And --

5 Q. Sorry. Go ahead.

6 A. It was -- And I honestly don't remember when
7 it was, either. I just wanted to make sure that I got
8 that on the record --

9 Q. Sure.

10 A. -- 'cause I'm sure I had watched it once, but
11 I don't remember where he was or what was going on.

12 Q. Do you remember whether it was before or after
13 the Stockley verdict protests?

14 A. I do not.

15 Q. Okay. Was it about the Stockley verdict
16 protests?

17 A. I don't remember.

18 Q. Did you recognize specifically any police
19 officers the weekend of September the 15th?

20 A. Recognize people as police officers or police
21 officers that I knew?

22 Q. Yeah, police officers that you knew.

23 A. I did not.

24 Q. Okay. Did you observe or witness the Highway
25 40 blockage on September the 15th?

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1 A. No.

2 Q. Have you ever applied for a permit to protest?

3 A. No.

4 Q. The weekend of September 15, do you recall
5 hearing that there was a free speech zone --

6 A. No.

7 Q. -- designated for protestors?

8 A. No, I don't recall that.

9 Q. Do you know of any other officer-involved
10 shootings since the Stockley verdict?

11 A. Yes.

12 Q. And were you involved in any protests related
13 to those incidences?

14 A. No.

15 Q. You said since this incident, you've protested
16 at an MSI rally downtown?

17 A. Yes.

18 Q. Okay. Any other protest that you've
19 participated in after the weekend of September 15, 2017?

20 A. No.

21 Q. I want to draw your attention to --

22 MS. DUNCAN: We can mark this as, I guess, B
23 maybe.

24 (At this point, an off-the-record discussion
25 was had.)

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1 (At this point, Defendant's Exhibit Mobley B
2 was marked for identification.)

3 (Questions by Ms. Duncan)

4 Q. Okay. I'm showing you what's been marked as
5 Defendant's Deposition Exhibit Mobley B. Okay. And do
6 you recognize that?

7 A. Yes.

8 Q. Okay. And is that the Declaration that you
9 drafted or someone helped you draft in preparation for
10 the preliminary injunction hearing in this case?

11 A. Yes.

12 Q. Okay. And as I understand it, and it may be
13 on there -- yeah, you can go ahead and look at it -- you
14 say in there that you had heard that pepper spray or gas,
15 teargas or mace was used the weekend of September 15?

16 A. Yes.

17 Q. Okay. And how did you hear that?

18 A. I don't remember specifically. Through news
19 coverage and talking to people who knew.

20 Q. Okay. "News coverage" being the newspaper or
21 TV?

22 A. It --

23 Q. Both?

24 A. Most likely the newspaper, but online.

25 Q. Okay. And when do you remember hearing about

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1 that?

2 A. Immediately afterwards. Maybe the next day.

3 Q. So, that Saturday, Sunday, Monday maybe?

4 A. Yes.

5 Q. Okay. Did you observe anything regarding an
6 encirclement tactic or what some have called kettling on
7 the evening of September 17?

8 A. No.

9 Q. That's all I'm going to use for that one. I
10 want to put something else in front of you. We received
11 some production from Plaintiffs in this matter. One of
12 the things we received are screenshots, I believe, from
13 your cell phone. Did you provide that to your attorney?

14 A. Yes.

15 Q. Okay.

16 MS. DUNCAN: We can mark this Mobley C, I
17 guess.

18 (At this point, Defendant's Exhibit Mobley C
19 was marked for identification.)

20 (Questions by Ms. Duncan)

21 Q. And I'll represent to you that this is
22 actually a screenshot of a series of screenshots that we
23 received.

24 A. (Nodding.)

25 Q. This one in particular is labeled Plaintiff

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1 00774. And the side caption is, I think, Mobley
2 Screenshot 8 or something like that.

3 A. (Nodding.)

4 Q. And these messages were sent to a Gilbert M.
5 Who is Gilbert M.?

6 A. He's my uncle.

7 Q. Okay. What's his last name, Mobley?

8 A. Yes.

9 Q. Okay. Makes sense. And is he affiliated with
10 any kind of newspaper or press, media in any way?

11 A. No.

12 Q. Okay. In one of the screenshots, you tell him
13 not to say anything or use your name in anything. Did
14 you mean in his interaction with other people?

15 A. Yes.

16 Q. Okay. And I wanted to show you this and you
17 can read through it. This is Defendant's Exhibit C,
18 Mobley C. Do you recog- -- Sorry. Are you finished
19 reading it?

20 A. Yes.

21 Q. And does that accurately depict what you
22 texted to your uncle?

23 A. I don't remember texting it, but I assume it
24 does.

25 Q. Okay. You have no reason to dispute --

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1 A. No.

2 Q. -- that you sent that to him?

3 A. (Shaking head.)

4 Q. Do you remember when you sent that to him?

5 A. No, I don't.

6 Q. Okay. And in the screenshot, is it true that
7 you describe the police as murderers?

8 A. I see that I say they murder people.

9 Q. Okay. And do you describe them as terrorists?

10 A. Yes.

11 Q. Okay. And do you say that you wish their
12 bodies were thrown in cages and tortured?

13 A. I see that I say their bodies should be thrown
14 in the same cages where they throw millions and millions
15 of other people's bodies, but there's nothing about
16 torture.

17 Q. Okay. Does it suffice to say you're not a big
18 fan of the police?

19 A. No.

20 Q. You would or would not agree with that?

21 A. I would agree with that.

22 Q. Is that an accurate portrayal of how you felt
23 whenever you sent that to your uncle?

24 A. Yes.

25 Q. Is that an accurate portrayal of how you feel

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1 today?

2 A. I've calmed down some. I'm not as angry as I
3 was when I sent it.

4 Q. But the sentiment behind it --

5 A. Yes.

6 Q. Let me finish that entire question 'cause I
7 didn't. The sentiment behind it is the, correct, as how
8 you feel today?

9 A. I think the Department should be abolished. I
10 no longer believe that they should be thrown in cages.

11 Q. Okay. Fair enough.

12 Prior to the incident on September 17, 2017,
13 had you had any other run-ins with the police or
14 interactions with police?

15 A. Which police?

16 Q. St. Louis PD.

17 A. I called an officer in 2012 or 2013 because of
18 my car had been broken into in the Central West End.
19 Other than that, I don't remember any interactions with
20 the SLMPD.

21 Q. Okay. You have -- Have you been arrested by
22 SLMPD before?

23 A. No.

24 Q. Okay. Been charged with any crime by SLMPD?

25 A. No.

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1 Q. Interacted with them in a capac- -- Have you
2 interacted with them in a capacity through Legal
3 Services?

4 A. Yes.

5 Q. And in what capacity?

6 A. I can say that they were interacting with a
7 client of mine and that's all I can say due to
8 attorney-client privilege.

9 Q. Okay, that's fair.

10 Anything about that interaction with your
11 client that caused you to have a negative perspective on
12 the SLMPD?

13 A. Yes.

14 MS. DUNCAN: Can we take just a minute to
15 compare notes and then I'll come back in?

16 (At this point, there was a break taken from
17 3:12 p.m. to 3:21 p.m.)

18 (Questions by Ms. Duncan)

19 Q. I just have a few follow-up for you, sir. You
20 said that on September 16 you went to Police Headquarters
21 with some Milk of Magnesia; is that right?

22 A. On September 17.

23 Q. That was the 17th?

24 A. Yes.

25 Q. Okay. And why did you bring Milk of Magnesia

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1 with you on the 17th?

2 A. Because it's used to treat exposure to pepper
3 spray and teargas.

4 Q. Did you anticipate that teargas and pepper
5 spray would be used that day?

6 A. I didn't know whether they would.

7 Q. Okay. I want to narrow in on when you knew
8 that either mace, pepper spray, or teargas was being
9 deployed. I know that you said a -- you learned it the
10 day after. Did you learn it the day after September 15?

11 A. I think so, yes.

12 Q. Okay. So, then you would have learned about
13 it on September the 16th; correct?

14 A. That -- Yes, that's approximately correct.

15 Q. Okay. And you still went out on September the
16 16th to Police Headquarters; is that right?

17 A. I went to Police Headquarters on the 17th?

18 Q. I'm sorry. You went to Central West End on
19 the 16th?

20 A. Yes.

21 Q. Okay. And you did that even though you knew
22 that mace, pepper spray, or teargas was deployed the day
23 before?

24 A. Yes.

25 Q. Okay. And then did you know whether or not

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1 there was mace, pepper spray, or teargas deployed on the
2 16th?

3 A. I do not know.

4 Q. Okay. Do you remember -- This may be the same
5 question. Do you remember hearing about teargas or mace
6 or pepper spray being deployed on the 16th?

7 A. No.

8 Q. Okay. So, on the seven- -- September 17, you
9 would have known that either on September 15 or 16
10 teargas, mace, or pepper spray had been deployed during
11 these protests; is that fair?

12 A. Yes, I wouldn't know what, necessarily, I
13 don't think, but I knew that there had been chemical
14 agents used.

15 Q. Okay. And that did not deter you from going
16 out those three days; is that correct?

17 A. Correct.

18 MS. DUNCAN: Okay. I have no further
19 questions at this time.

20 MR. ROTHERT: Okay, we'll review and sign.

21 (Deposition adjourned at 3:24 p.m.)

22 (SIGNATURE RESERVED)
23
24
25

MALEEHA AHMAD, et al v. CITY OF ST. LOUIS
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1 STATE OF)
2) SS
3 COUNTY OF)
4

5 I, WILLIAM PATRICK MOBLEY, do hereby state that
6 the foregoing statements are true and correct to the best
7 of my knowledge and belief.
8
9
10

11 _____
12 WILLIAM PATRICK MOBLEY
13
14

15 Subscribed and sworn to before me this _____ day
16 of _____, 2019.
17
18
19
20

21 _____
22 NOTARY PUBLIC
23
24
25

My Commission Expires:

MALEEHA AHMAD, et al v. CITY OF ST. LOUIS
Deposition of WILLIAM PATRICK MOBLEY taken on 01/28/2019

DEPOSITION CORRECTION SHEET
DEPOSITION OF WILLIAM PATRICK MOBLEY

In Re: MALEEHA AHMAD, et al vs. CITY OF ST. LOUIS
No. 4:17-CV-2455 CDP

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SIGNATURE OF DEPONENT

MALEEHA AHMAD, et al v. CITY OF ST. LOUIS
Deposition of WILLIAM PATRICK MOBLEY taken on 01/28/2019

C E R T I F I C A T E

I, Sara Alice Masuga, Certified Shorthand Reporter and Certified Court Reporter within and for the States of Illinois and Missouri, DO HEREBY CERTIFY that pursuant to agreement between counsel that on January 28, 2019, at the offices of the ACLU, 906 Olive Street, St. Louis, Missouri, there appeared before me the aforementioned witness, and having been duly sworn to tell the whole truth, was examined, and the examination was taken down in shorthand by me and afterwards transcribed upon the computer, and said transcription is herewith returned.

IN WITNESS WHEREOF, I have hereunto subscribed my name this 9th day of February, 2019.

Sara Alice Masuga, CSR, CCR
IL CSR No. 084-002993
MO CCR No. 1012

MASUGA REPORTING SERVICE
314/680-2424

MALEEHA AHMAD, et al v. CITY OF ST. LOUIS
Deposition of WILLIAM PATRICK MOBLEY taken on 01/28/2019

MASUGA REPORTING SERVICE
2033 Hiawatha Avenue
St. Louis, MO 63143-1215
(314)680-2424

February 9, 2019

ACLU

Attn: Anthony E. Rothert, Esq.
906 Olive Street
Suite 1130
St. Louis, MO 63101

In Re: MALEEHA AHMAD, et al vs. CITY OF ST. LOUIS
No. 4:17-CV-2455 CDP

Dear Mr. Rothert:

Enclosed herewith, please find your copy of the deposition transcript of WILLIAM PATRICK MOBLEY taken in the above-styled matter along with the original signature page of same.

Please have the deponent read your copy of the transcript, note any corrections to be made, sign the original signature page, have the deponent's signature notarized where indicated, and return the signed signature page and correction sheets to Ms. Duncan for proper filing of the original transcript with the Court.

Thank you for your attention to this matter.

Sincerely,

MASUGA REPORTING SERVICE

Sara Alice Masuga, CSR, CCR

cc: Ms. Duncan

MASUGA REPORTING SERVICE
314/680-2424